



Federal Communications Commission
Washington, D.C. 20554

October 13, 2011

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555 12th Street, N.W.
Washington, D.C. 20004

**Re: Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Assign
or Transfer Control of License and Authorizations, WTB Docket No. 11-65**

Dear Mr. Rosen:

I write with regard to AT&T's responses to the Commission's Information and Discovery Request ("Information Request"), served on AT&T on May 27, 2011. This letter relates in particular to Question 36 of the Information Request, which sought information about whether the merger will result in a net increase of jobs within the territorial United States.

Our review of the information currently in our record suggests that AT&T's responses on this issue remain incomplete. Indeed, AT&T to date has produced almost nothing in response to Question 36. Please therefore respond to the following requests by no later than October 31, 2011:

1. Please provide a full response to Question 36 of the Commission's May 27 Information Request, which sought "all plans, analyses and reports discussing the creation or loss of jobs if the [p]roposed [t]ransaction were to be consummated." Your response to this request should include, but not be limited to:
 - a. All analyses, reports, data or other documents in AT&T's possession, custody or control that analyze the size and location of AT&T's workforce both before and as anticipated after the merger. This would include, among all other responsive documents, (i) any documents enumerating the number of T-Mobile and AT&T jobs that will be eliminated or added should the merger be approved, and the effect of the proposed transaction on employment both inside and outside the United States; (ii) on an annual basis for the past five years and estimated for the next three years (without the merger), the number of AT&T wireless full-time employees ("FTEs") and, separately, wireless call center FTEs within and outside the United States, broken down by employment location and type of employee (direct or out-sourced); and (iii) the "detailed analysis focused specifically on identifying opportunities with the T-Mobile merger to bring good-

paying wireless call center jobs back to the United States” that AT&T stated it had developed.¹

2. Please also provide all documents (including but not limited to plans, analyses and reports) created within the past five years that analyze or describe AT&T’s strategy or policies with respect to the location of call center jobs. To the extent that AT&T intends the Commission to consider AT&T’s recent call center commitment as part of its public interest analysis, please discuss the relationship between this commitment and the transaction both generally and in view of AT&T’s prior non-merger-related announcements concerning call center job repatriation.²
3. Please quantify the portion of the estimated cost synergies resulting from the proposed transaction that arises from payroll reductions or other job-related savings.

If you have any questions, please contact either Renata Hesse at (202) 418-0697 or me at (202) 418-1728.

Very truly yours,



Rick Kaplan
Chief, Wireless Telecommunications Bureau

¹ See Press Release, AT&T Inc., AT&T to Bring 5,000 Call Center Jobs Back to U.S. Following T-Mobile Merger Closing (Aug. 31, 2011), *available at* <http://www.att.com/gen/press-room?pid=20909&cdvn=news&newsarticleid=32663&mapcode=corporate|financial>.

² See Press Release, AT&T Inc., AT&T Nearing Completion of Program to Move 5,000 Outsourced Jobs Back In-House (Jan. 29, 2009), *available at* <http://www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=26507&mapcode=corporate|mk-employees>; Press Release, AT&T Inc., AT&T Nevada Opens New Las Vegas Call Center (Oct. 15, 2008), *available at* <http://www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=26251&mapcode=corporate>; Press Release, AT&T Inc., AT&T to Bring 2,000 Outsourced Jobs In-House (Sept. 21, 2006), *available at* <http://www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=22760&mapcode=corporate>; *see also* David Saleh Rauf, *Union Pressures AT&T to Bring Jobs Home*, SAN ANTONIO EXPRESS-NEWS, Sept. 5, 2009, *available at* <http://www.mysanantonio.com/business/local/article/Union-pressures-AT-T-to-bring-jobs-home-844776.php>; Jon Gambrell, *AT&T Brings 175 Jobs Back to U.S. / Call Center Work Had Been Outsourced*, HOUS. CHRON., Sept. 20, 2007, *available at* <http://www.chron.com/business/article/AT-T-brings-175-jobs-back-to-U-S-1820027.php>.